

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF GEORGIA  
ATLANTA DIVISION**

LOUISE MERRITT,	)	
	)	
Plaintiff,	)	
	)	CIVIL ACTION FILE NO. _____
vs.	)	
	)	
US MARSHALS SERVICE and Z.	)	
PARADOWSKI,	)	
	)	
Defendants.	)	
	)	
	)	

**COMPLAINT FOR DAMAGES**

COMES NOW, Louise Merritt, Plaintiff, and hereby files this Complaint for Damages against Defendants US Marshals Service and Z. Paradowski for personal injury following a motor vehicle accident. Plaintiff states the following:

**PARTIES, JURISDICTION AND VENUE**

1.

Louise Merritt (hereinafter “Ms. Merritt”) is a resident of Atlanta, Fulton County, Georgia.

2.

US Marshals Service is a federal agency located at 75 Ted Turner Drive SW Atlanta, Georgia and he may be served at this address with a summons, complaint and other related legal papers. Z. Paradowski (hereinafter “Mr. Paradowski”) is an agent of US Marshals Service at 75 Ted Turner Drive SW Atlanta, Georgia and he may be served at this address with a summons, complaint and other related legal papers.

3.

Jurisdiction and venue are proper in this Court once Defendants US Marshals Service and Paradowski has been served because Defendant Paradowski resides in Fulton County, Georgia.

**FACTUAL ALLEGATIONS**

4.

On or about October 13, 2021 Ms. Merritt was driving her motor vehicle heading east on M.L.K drive in Atlanta, Georgia.

5.

Ms. Merritt was traveling in the right lane when Mr. Paradowski turned left in his company vehicle in front of her and collided with her.

6.

Ms. Merritt was not negligent in the manner in which she operated her vehicle.

7.

Ms. Merritt was transported to Grady hospital.

8.

Ms. Merritt incurred medical bills in excess of \$34,000 to date and is continuing to treat with medical providers.

9.

Ms. Merritt experienced pain and suffering as a result of the negligence of Defendant Paradowski.

**COUNT I**

**NEGLIGENCE AGAINST DEFENDANTS**

10.

Plaintiff adopts and incorporates by reference paragraphs 1 through 9 of Plaintiff's Complaint for Damages as if said paragraphs are set forth fully herein with respect to Count I of this Complaint for Damages.

11.

Defendant Paradowski, while employed as an agent of US Marshals Service and while in the scope of his duties, negligently struck Ms. Merritt's motor vehicle on or about October 13, 2021, in Fulton County, Georgia by turning left in front of Ms. Merritt's on coming motor vehicle

12.

Because of the negligence of Defendants US Marshals Service and Paradowski, Ms. Merritt suffered injury to her body, pain and suffering and Plaintiff has incurred unnecessary medical bills.

**PRAYER FOR RELIEF**

WHEREFORE, Plaintiff prays that she have a trial on all issues and judgment against Defendant as follows:

- a. That Plaintiff recovers the full value of her past and future medical expenses and past and future lost wages in an amount to be proven at trial;
- b. That Plaintiff recovers for physical pain and suffering, loss of enjoyment of life, and emotional distress in an amount to be determined at trial;
- c. That Plaintiff recovers reasonable attorney's fees and costs of litigation and any statutory penalties allowed by law;
- d. That Plaintiff recovers punitive damages for the willful and wanton conduct of the defendant;
- e. That Plaintiff recovers such other and further relief as the court deems appropriate;
- f. That all issues be tried at trial.

This the 5th day of July, 2023.

Respectfully Submitted,

*Dennis C. Francis, Jr.*  
DENNIS C. FRANCIS, JR. #272725  
Attorney for Plaintiff

**D'AMOUR FRANCIS, LLC**  
2507 Hughes Court, SW  
Atlanta, Georgia 30331  
C: (404) 644-5283  
dfrancis@damourfrancis.com

